

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

Robert Dedmon,	§	CIVIL ACTION NO.
Plaintiff,	§	4:21-cv-03371
	§	
	§	JUDGE CHARLES ESKRIDGE
vs.	§	
	§	Jury Demand
Shell Exploration &	§	
Production Company and	§	
Shell Trading Services	§	
Company,	§	
Defendants.	§	

**PLAINTIFF ROBERT DEDMON'S WITNESS LIST**

Robert Dedmon may call any witness listed in Defendants' witness list.

compensatory damages: before and after witnesses		
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Keyani Adigun</b>	2448 Baldwin Crescent NE Washington, D.C. 20018
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian sister topics: one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Brandon Crutchfield</b>	8700 Stacy Road #5119 McKinney Texas 75070
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian friend since high school topics: one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Brushaud Callis</b>	12110 Upton Park, San Antonio, Texas 78253
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian friend since college topics: one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	

NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Brooke Dedmon</b>	1 Acosta Valley Drive Missouri City, Texas 77459
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian wife <b>topics:</b> one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Karen Dedmon</b>	5303 Amber Sky Lane Rosharon, Texas 77583
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian mother <b>topics:</b> one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Robert Dedmon, Jr.</b>	5303 Amber Sky Lane Rosharon, Texas 77583
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian father <b>topics:</b> one of the witnesses who will collectively address the non-wage harm to his son, including comparison of his son before and after learning of the discrimination	

NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Robert Dedmon IV</b>	1 Acosta Valley Drive Missouri City, Texas 77459
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian plaintiff <b>topics:</b> one of the witnesses who will collectively address the non-wage harm to him, including comparison of how he was before and after learning of the discrimination	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>James Ledbetter</b>	6307 Flewellen Falls Lane Fulshear, Texas 77441
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian friend, former Shell employee <b>topics:</b> one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Shara McKinnon (Brown)</b>	Pilot Flying J 20 E Greenway Plaza, Ste 200 Houston, Texas 77046
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian family friend <b>topics:</b> one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	

NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Jamal Porter</b>	Simon Property Group 2901 South Capital of Texas Highway Austin, Texas 78746
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian friend since college <b>topics:</b> one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Brandon Saunders</b>	Bell's Life Enhancement 6302 Highway 6, Suite K Missouri City, Texas 77459
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian friend <b>topics:</b> one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon, including comparison of Mr. Dedmon before and after learning of the discrimination	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Jasmine Turner</b>	Alchemy Counseling and Wellness, PLLC 1011 Augusta Drive, Ste #107 Houston, Texas 77057
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input checked="" type="checkbox"/> Expert <input checked="" type="checkbox"/> Record Custodian treating counselor <b>topics:</b> one of the witnesses who will collectively address the non-wage harm to Mr. Dedmon; treatment; teaching jury about anxiety, panic attacks, cumulative trauma; explanation of the subjects identified in expert disclosures for her	

other trial witnesses: liability, economic damages, and punitive damages		
No.	WITNESS NAME	WITNESS ADDRESS
	<b>Gentill Abdulla</b>	9613 Bayou Brook Street Houston, Texas 77063
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell power trading analyst who reported to Luis Lugo and worked with Mr. Dedmon <b>topics:</b> basic background; organizational structure; pay structure; comparative skill of those he worked with on the inside sales team; observed differential treatment of workers based on protected characteristics	
No.	WITNESS NAME	WITNESS ADDRESS
	<b>Gaurdie E. Banister</b>	2415 San Felipe Street #9 Houston, Texas 77019-2509
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell employee; director with several organizations, such as Enbridge, Dow, Tyson Foods, and Russell Reynolds Associates; CEO of Different Points of View; Chairman of Tyson Foods, Inc.'s Compensation and Leadership Development Committee <b>topics:</b> basic background; history of race discrimination at Shell based on observation and experience; his quote in the Original Petition and Jury Demand filed in this case; equitable compensation systems; preventing and stopping unlawful pay disparities	

NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Jim Barker</b>	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team <b>topics:</b> basic background; organizational structure; pay structure; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; company policies	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Lisa Billington</b>	3000 Bissonnet Street, Apt. 7110 Houston, Texas 77005
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former human resources professional for Shell <b>topics:</b> basic rules to prevent and stop pay discrimination; pre-employment process from offer to first day of payroll; involvement and knowledge about 2014 hiring process related to the job duties position that Mr. Dedmon was ultimately hired for; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Beth Bowman</b>	Targa 811 Louisiana, Suite 2100 Houston, Texas 77002
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Senior Vice President for Shell and direct supervisor for Sri Rangan <b>topics:</b> basic rules to prevent and stop pay discrimination; involvement and knowledge about 2014 hiring process related to the job duties position that Mr. Dedmon was ultimately hired for; company promises, policies,	

	and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Robert Dedmon</b>	1 Acosta Valley Drive Missouri City, Texas 77459
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian plaintiff topics: all topics concerning liability and damages	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Michael Deley</b>	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team topics: basic background; organizational structure; pay structure; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; company policies; the events surrounding the need to fill a vacant position on the team in 2021	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Megan Foltz (Rozelle)</b>	409 W. 24th Street Houston, Texas 77008
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell human resources account manager topics: basic rules to prevent and stop pay discrimination; involvement and knowledge about 2014 and 2015 hiring process related to the job duties positions that Mr. Dedmon was ultimately offered; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case	



No.	WITNESS NAME	WITNESS ADDRESS
	<b>Patrick Frnka</b>	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team topics: basic background; organizational structure; pay structure; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; company policies; the events surrounding the need to fill a vacant position on the team in 2021	
No.	WITNESS NAME	WITNESS ADDRESS
	<b>Tim Hood</b>	Mercuria Energy America 20 Greenway Plaza #650 Houston, Texas 77046
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell manager over power trading topics: basic background; organizational structure; pay structure; his own pay and job grades; his experience and observations related to his work and position in trading; company policies; his observations concerning unequal pay	
No.	WITNESS NAME	WITNESS ADDRESS
	<b>Doug Hund</b>	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team topics: basic background; organizational structure; pay structure; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; company policies; the events surrounding the need to fill a vacant position on the team in 2021	

NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Sarah Hutnek</b>	1217 W. 16 <sup>th</sup> Street Houston, Texas 77008
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell human resources consultant <b>topics:</b> basic rules to prevent and stop pay discrimination; involvement and knowledge about response to EEOC charge of discrimination; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Ryan Kolkmann</b>	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team <b>topics:</b> basic background; organizational structure; pay structure; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; company policies; the events surrounding his exit and so the need to fill a vacant position on the team in 2021	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>James Ledbetter</b>	6307 Flewellen Falls Lane Fulshear, Texas 77441
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell employee <b>topics:</b> basic background; organizational structure; pay structure; his own pay and job grades; his experience and observations related to his work and positions with Shel; company policies; observed differential treatment of workers based on protected characteristics	

NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Meredith Lilly</b>	Mercuria Energy America 20 Greenway Plaza #650 Houston, Texas 77046
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell employee on the inside sales team <b>topics:</b> basic background; organizational structure; pay structure; her own pay and job grades; her experience and observations related to her work and position on the inside sales team; company policies; her offer of employment at JG5 for the same job duties roles later offered to Mr. Dedmon	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Grace Loh</b>	150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee applicant for the open 2021 raise that was given to Michael Deley <b>topics:</b> basic background, the process surrounding her application and overall process concerning same	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Luis Lugo</b>	13802 Majestic Spring Lane Humble, Texas 77396
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell manager over energy trading; current Vice President and Head of ERCOT Trading for Mercuria Energy America <b>topics:</b> subjects addressed in his declaration; basic background; organizational structure; pay structure; his own pay and job grades; his experience and observations related to his work and position working with the inside sales team; company policies; observed differential treatment of workers based on protected characteristics	

No.	WITNESS NAME	WITNESS ADDRESS
	<b>Logan Luzzi</b>	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team <b>topics:</b> basic background; organizational structure; pay structure; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; company policies	
No.	WITNESS NAME	WITNESS ADDRESS
	<b>Sean Matthews</b>	30232 Post Oak Run Magnolia, Texas 77355
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell energy trader; current head of Midwest Sales at Mercuria <b>topics:</b> basic background; organizational structure; pay structure; his own pay and job grades; his experience and observations related to his work and position as a trader working with the inside sales team; his reports about pay disparities to Glenn Wright; company policies; observed differential treatment of workers based on protected characteristics	
No.	WITNESS NAME	WITNESS ADDRESS
	<b>Laura Moses</b>	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee relations advisor <b>topics:</b> basic rules to prevent and stop pay discrimination; involvement and knowledge about response to EEOC charge of discrimination; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case	

NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Priscilla Partida</b>	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell manager over inside sales <b>topics:</b> basic background; organizational structure; pay structure; her own pay and job grades; her experience and observations related to her work and position working with the inside sales team; company policies	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Teri Ramsey (Cornelius-Olmen)</b>	3003 Eagle Ridge Way Houston, Texas 77084
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell human resources manager for Shell <b>topics:</b> basic rules to prevent and stop pay discrimination; involvement and knowledge about 2014 hiring process related to the job duties position that Mr. Dedmon was ultimately hired for; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Srikala (Sri) Rangan</b>	30 Dorthea Lane Sugar Land, Texas 77479
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell hiring manager and later Vice President <b>topics:</b> the subjects addressed in her declaration; basic background; basic rules to prevent and stop pay discrimination; involvement and knowledge about 2014 and 2015 hiring process related to the job duties position that Mr. Dedmon was ultimately hired for and then moved to; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; direct evidence of race discrimination in this case; her EEO report to Shell; her knowledge, observation, and experience concerning all of the above	

NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Raif Rucker</b>	204 Vincent Street Houston, Texas 77009
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team <b>topics:</b> basic background; organizational structure; pay structure; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; company policies; observed and experienced differential treatment of workers based on protected characteristics	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Robyn L. Sutton</b>	Shell 1000 Main Street Houston, Texas 77010
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell Trading & Supply human resources manager <b>topics:</b> basic rules to prevent and stop pay discrimination; involvement and knowledge about 2014 hiring process related to the job duties position that Mr. Dedmon was ultimately hired for; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Michael Tickle</b>	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell manager for the inside sales team <b>topics:</b> basic background; organizational structure; pay structure; his own pay and job grades and those of his team members over time; his experience and observations related to his work and position with the inside sales team; company policies; the events surrounding the need to	

	fill a vacant position on the team in 2021; potential falsification of performance data	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Ken Ueng</b>	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell employee on the inside sales team topics: basic background; organizational structure; pay structure; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; company policies	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Erin Verdon</b>	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell Trading and Supply Vice President of Human Resources who signed employment offer letter for Mr. Dedmon topics: basic rules to prevent and stop pay discrimination; involvement and knowledge about 2014 hiring process related to the job duties position that Mr. Dedmon was ultimately hired for; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>D'Andra Wallace</b>	Total Energies 1201 Louisiana Street, Suite 1800 Houston, Texas 77002
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian former Shell employee who worked with Mr. Dedmon She can testify topics: basic background; organizational structure; pay structure; her own pay and job grades; her experience and observations related to her work with Mr. Dedmon	

NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Kendra Williams</b>	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Shell recruiter <b>topics:</b> basic rules to prevent and stop pay discrimination; involvement and knowledge about 2014 hiring process related to the job duties position that Mr. Dedmon was ultimately hired for; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Glenn T. Wright</b>	Shell 150 N. Dairy Ashford Houston, Texas 77090
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Current SVP for Shell <b>topics:</b> basic rules to prevent and stop pay discrimination; organizational structure; pay structure; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; reports he received about pay inequity; Sri Rangan's disclosure of discrimination to Mr. Dedmon and his negative reaction to same	



post-verdict witnesses: attorneys' fees		
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Amy E. Gibson</b>	Gibson Wiley PLLC 1500 Jackson Street #109 Dallas, Texas 75201-4923
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input checked="" type="checkbox"/> Expert <input checked="" type="checkbox"/> Record Custodian Attorney-in-Charge and counsel of record in this civil action for Robert Dedmon. She is expected to testify on attorneys' fees.	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Andrew Golub</b>	Dow Golub Remels & Gilbreath, PLLC 2700 Post Oak Boulevard, Suite 1750 Houston, Texas 77056
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input checked="" type="checkbox"/> Expert <input checked="" type="checkbox"/> Record Custodian He is expected to testify as an expert on attorneys' fees.	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Amanda C. Hernandez</b>	AH Law, PLLC 5718 Westheimer, Suite 1000 Houston, Texas 77057
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input checked="" type="checkbox"/> Expert <input checked="" type="checkbox"/> Record Custodian Of counsel and counsel of record in this civil action for Robert Dedmon. She is expected to testify on attorneys' fees.	

NO.	WITNESS NAME	WITNESS ADDRESS
	<b>Brian Sanford</b>	Sanford Firm Attorneys at Law 1910 Pacific Avenue, 15th Floor Dallas, Texas 75201
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input checked="" type="checkbox"/> Expert <input checked="" type="checkbox"/> Record Custodian He is expected to testify as an expert on attorneys' fees.	
NO.	WITNESS NAME	WITNESS ADDRESS
	<b>David L. Wiley</b>	Gibson Wiley PLLC 1500 Jackson Street #109 Dallas, Texas 75201-4923
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input checked="" type="checkbox"/> Expert <input type="checkbox"/> Record Custodian Of counsel and counsel of record in this civil action for Robert Dedmon. He is expected to testify on attorneys' fees.	

Date: February 10, 2025

Respectfully submitted,

*/s/ Amy Gibson*

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Ms. Amy E. Gibson  
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*and*

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